

# **EXHIBIT 6**

FRANCIS Y. CHIN  
AMY BARTOLETTI vs. CITIGROUP

August 21, 2012  
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2 Q. Do you remember when Amy was

3 informed that she was going to be laid off?

4 A. I don't recall what date it was.

5 Q. Was she informed when everyone

6 else was informed that they were being laid

7 off?

8 A. I suspect they were all done

9 within a relatively short period of time.

10 Q. On the same day?

11 A. I don't know.

12 Q. Who notified Amy that she was

13 going to be laid off?

14 A. I met with her along with David

15 Brownstein.

16 Q. And was anyone else in the room?

17 A. I do not believe so.

18 Q. And how long did that meeting

19 last?

20 A. Half an hour, maybe.

21 Q. And what was discussed?

22 A. David and I and Amy, we, I think I

23 advised of Amy that she was being, she was

24 being asked to leave the department, told her

25 that -- I think she was given a contact person

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2 in HR who had all the papers about her

3 separation and all that stuff.

4 Q. Was anything else discussed?

5 A. Not with the three of us, no.

6 Q. Well, you said that meeting lasted

7 about a half hour, is that correct?

8 A. I would think, 15 to 30 minutes,

9 something like that. It was fairly quick.

10 Q. Did you go into the reasons as to

11 why she was being laid off?

12 A. Nope.

13 Q. So you just gave her the name of

14 someone in HR to contact, and that she was

15 being laid off. Is that all that was said?

16 A. Procedurally on all the RIFs,

17 people were notified of it and then told to

18 speak to the HR professionals as related to

19 any separation packages or any agreements or

20 whatever.

21 Q. Did Amy say anything during this

22 meeting?

23 A. I don't recall what she said.

24 Q. And did you have a meeting with

25 David Brownstein prior to informing Amy?

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2 A. I don't think so.

3 Q. When did you tell Mike Koessel

4 that Amy was going to be laid off?

5 A. I don't believe I ever told him.

6 Q. Do you know if he knew that Amy

7 was being laid off prior to Amy finding out?

8 A. I don't know.

9 Q. How was the housing group doing in

10 2008?

11 A. I don't recall.

12 Q. You don't know if it was doing

13 well or not?

14 A. No.

15 Q. Would Mr. Brownstein know?

16 A. I don't know.

17 Q. Wasn't he managing that group?

18 A. You asked me what he knew and I

19 couldn't tell you what he knows about what

20 they were doing.

21 Q. Is it his job to know?

22 A. He was responsible for the group

23 and he had to determine what he needed to know

24 to do his job.

25 Q. Do you know if Mike Koessel's

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2 salary increased after Amy was fired?

3 A. I don't recall.

4 Q. Would you be surprised if his

5 salary increased?

6 A. We have -- we have specific salary

7 levels by title, depending on when someone was

8 promoted, and budgetary constraints they may

9 not be brought up to their full title grade

10 salary level. So if he was below it, and he

11 was brought up to it, it's more

12 administrative. If he was paid more than the

13 salary level, I'd be shocked.

14 Q. Now, when you were trying to

15 arrive at the ask number, were you taking into

16 account total comp for calendar year 2007?

17 A. I'm sorry, could you try that

18 question again.

19 Q. What comp figures were you using

20 when determining whether you could meet the

21 ask number?

22 A. I believe the formula we were

23 given was based on 2007 incentive comp paid in

24 January of 2008.

25 Q. Did you ever think about reducing

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2 everyone's discretionary bonus in order to  
3 arrive at the number?  
4 MR. TURNBULL: Objection to form.  
5 A. That was not what I was told to  
6 do.  
7 Q. Wouldn't it have been an  
8 alternative in order to save jobs?  
9 MR. TURNBULL: Objection to form.  
10 A. It was not an alternative offered  
11 to me.  
12 Q. No one suggested it?  
13 A. I don't know if anyone suggested  
14 it. I surely did not.  
15 Q. Did you think of it at the time?  
16 A. No.  
17 Q. You didn't think of perhaps we  
18 should reduce people's salaries so we can save  
19 jobs?  
20 MR. TURNBULL: Objection to form.  
21 A. I was instructed what the ground  
22 rules to determine the RIF budget was, and I  
23 used it.  
24 Q. And no one in the meeting with Mr.  
25 Marsh suggested reducing incentive comp?

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1 F. Y. CHIN  
2 MR. TURNBULL: Objection: asked  
3 and answered.  
4 A. I do not.  
5 Q. Why not?  
6 A. Because the firm told us what the  
7 ground rules were.  
8 Q. Were you thinking about  
9 eliminating the housing group altogether?  
10 A. Yes, sir.  
11 Q. Why?  
12 A. I didn't think there was much  
13 future in housing at all.  
14 Q. Didn't you just testify that you  
15 didn't know how the housing group was doing?  
16 A. It had nothing to do with how the  
17 housing group was doing. It is my perception  
18 of where the industry is headed.  
19 Q. And what was your perception based  
20 upon?  
21 A. Having worked in housing for a  
22 while, the single family mortgage business is  
23 a structured finance business built around  
24 arbitrage between taxable and tax exempt  
25 levels, and given the complete collapse of the

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2 A. I don't recall if that came up.  
3 Q. Do you think that would have been  
4 a viable alternative?  
5 MR. TURNBULL: Objection.  
6 A. It is not what we were charged to.  
7 Q. But do you think it would have  
8 been a viable alternative?  
9 MR. TURNBULL: Objection.  
10 A. I don't think it matters what I  
11 thought.  
12 Q. But I'm asking you, do you think  
13 it would have been a viable alternative?  
14 A. Not the way the instructions were  
15 delivered.  
16 Q. Apart from the instructions, I'm  
17 asking you do you think it would be a viable  
18 alternative?  
19 MR. TURNBULL: Objection.  
20 A. I do not believe I had that  
21 option, so it was not something I considered.  
22 Q. All right I'm going to ask you the  
23 question for the fifth time now. Do you think  
24 it would have been a viable alternative?  
25 A. No.

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2 credit markets and the spread between taxable  
3 and tax exempt bonds, as well as the collapse  
4 of the mortgage business, it seemed to me that  
5 the ability to originate new mortgages going  
6 forward is very suspect.  
7 Q. Did you know how much revenue the  
8 housing group generated in 2008?  
9 A. It didn't matter.  
10 Q. Did you know what deals they had  
11 in the pipeline?  
12 A. It also did not matter.  
13 Q. Do you still have the housing  
14 group?  
15 A. We still have the housing group.  
16 Q. Is it the same size as post  
17 November 2008?  
18 MR. TURNBULL: Objection to form.  
19 A. I don't know exactly. It is not  
20 bigger.  
21 Q. So it is the same head count?  
22 A. Maybe less. It is definitely not  
23 bigger.  
24 Q. Is it still generating revenue as  
25 it did in '08?

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2 A. Not in the healthcare group. I  
3 think as we talked about earlier, David and I  
4 made a decision about Amy.  
5 Clearly, I was preoccupied with my  
6 budget. He clearly looked at other things.  
7 And I'm sure the fact that he spent a lot with  
8 Amy on student loans, and Mike was purely a  
9 housing banker, influenced him.  
10 Q. How do you know what influenced  
11 David Brownstein?  
12 A. I don't know. It's possible.  
13 Q. You are guessing, right?  
14 MR. TURNBULL: Objection.  
15 A. I think David -- David's been in  
16 the business a long time. He weighs a lot of  
17 different things, and I think having  
18 familiarity with their business which was one  
19 of his responsibilities, you know, clearly  
20 helped him make some decisions.  
21 Q. So you are guessing as to what he  
22 considered?  
23 MR. TURNBULL: Objection.  
24 A. I'm not sure of his specific  
25 decision-making process.

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1 F. Y. CHIN  
2 Q. Did you ever present a list of  
3 people to David Cyganowski for the November  
4 2008 layoff?  
5 A. At what point?  
6 Q. At any point in time.  
7 A. I think after the final  
8 determination of the RIF was done, I think all  
9 the group heads were made aware who was being  
10 asked to leave the department, so he clearly  
11 would have found out at that point.  
12 Q. How about Mr. Hessler?  
13 A. I think all the group heads were  
14 made aware of who was being asked to leave.  
15 Q. But it was Mr. Hessler that told  
16 you about Lisa Conley, not the other way  
17 around?  
18 A. I believe so.  
19 Q. Did you select anyone to be  
20 included in the November 2008 layoff, other  
21 than Amy?  
22 A. Other than Amy, no.  
23 And in Amy's case I was part of  
24 that process, obviously, with David.  
25 Q. Were you part of the process with

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2 respect to anybody other than Amy?  
3 A. No.  
4 Q. Did you ever tell Mr. Cyganowski  
5 and/or Mr. Hessler as to the criteria they  
6 should employ in determining who to select for  
7 layoff?  
8 MR. TURNBULL: Objection: asked  
9 and answered.  
10 A. Other than the original  
11 conversation with the group heads about future  
12 business opportunities and a number of other  
13 factors, not any follow-up as to any specific  
14 names.  
15 Q. And the number of other factors  
16 you just said you testified to earlier,  
17 correct?  
18 A. Right.  
19 Q. Mr. Chin, do you know who Nadine  
20 Mentor is?  
21 A. She was a banker in the Southeast.  
22 Q. Do you know if she was a director?  
23 A. I don't recall her title in '08.  
24 Q. And do you know -- I'm sorry, she  
25 was in the Southeast group, correct?

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1 F. Y. CHIN  
2 A. Southeast group.  
3 Q. And do you know what clients she  
4 covered?  
5 A. I knew she covered Virgin Islands.  
6 Other than that, I'm not sure what else.  
7 Q. Why do you know that?  
8 A. Because as part of my e-mail  
9 review process, we intercepted her  
10 transferring files of the firm related to that  
11 transaction, to her home.  
12 Q. Do you know if she had permission  
13 to transfer files?  
14 A. She definitely didn't have  
15 permission from me.  
16 Q. Do you know if she had permission  
17 from anyone else?  
18 A. I do not, but since she was, I  
19 believe, I'm not sure she was an employee at  
20 the time when she did, but she definitely did  
21 not have my permission, so the answer is no.  
22 Q. But you don't know if she had  
23 permission from anyone else?  
24 A. No, but it definitely hit our  
25 system screen as a questionable e-mail.